

REMARKS

By this amendment, claims 12-13 and 15-18 have been amended. The specification has been amended to correct minor informalities. Accordingly, claims 1-10 and 12-18 are currently pending in the application, of which claims 1 and 12 are independent claims.

Applicants respectfully submit that the above amendments do not add new matter to the application and are fully supported by the specification. Support for the amendments may be found at least in Figures 4A through 4D, and paragraphs 0057 and 0063-0066 of the specification.

In view of the above amendments and the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

Specification Objection

In the Office Action, the specification at page 10, line 3 was objected to for a typographical error. The specification has been amended to correct the typographical error. Accordingly, Applicants respectfully request withdrawal of the objection to the specification.

Rejections Under 35 U.S.C. § 112, second paragraph

Claims 13 and 18 stand rejected under 35 U.S.C. § 112, second paragraph for lack of antecedent basis. Claims 13 and 18 have been amended to overcome the rejection. This amendment is made for the sole purpose of clarifying claims 13 and 18. This amendment is not made for the purpose of avoiding prior art or narrowing the claimed invention, and no change in claim scope is intended. Therefore, Applicants do not intend to relinquish any subject matter by these amendments. Applicants respectfully submit that claims 13 and 18 fully comply with the requirements of 35 U.S.C. § 112, second paragraph.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 112, second paragraph rejection of claims 13 and 18.

Rejections Under 35 U.S.C. § 103

Claims 1-10, 12, and 14-18 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U. S. Patent No. 6,366,025 issued to Yamada ("Yamada") in view of U. S. Patent No. 5,614,733 issued to Zhang, *et al.* ("Zhang"). Claim 13 stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Yamada in view of Zhang, further in view of Japanese Patent No. JP 2001-109399 issued to Yamada. Applicants respectfully traverse this rejection for at least the following reasons.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the reference or references, when combined, must disclose or suggest all of the claim limitations. The motivation to modify the prior art and the reasonable expectation of success must both be found in the prior art and not based upon a patent applicant's disclosure. See *in re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The examiner has failed to establish a *prima facie* case of obviousness. Assuming, *arguendo*, that the references may be combined and a reasonable expectation of success exists, the combined references do not disclose or suggest all of the claim limitations.

Claim 1 recites, *inter alia*, a flat panel display where "transistors of at least two unit pixels of the R, G, and B unit pixels include channel layers with different current mobilities." The Office Action asserts that this limitation is present in Zhang. However, Zhang teaches TFTs with "different degrees of crystallinity" used as either "TFTs for driving an active-matrix circuit" or "TFTs in the pixel circuits." See Zhang, col. 3, lines 19-31; col. 3, line 67 – col. 4, line 1; col. 4,

lines 35-40. Therefore, Zhang's TFTs with different current mobilities are physically located in distinct and separate regions of the substrate: the "peripheral circuit region" and the pixel "matrix region" as shown in Zhang's Figure 3. See also Zhang, col. 5, lines 41-45. Unlike in this application, Zhang does not teach nor suggest transistors of at least two unit pixels within a pixel having channel layers with different current mobilities. Thus, neither Yamada nor Zhang, alone or in combination, disclose or suggest all of the limitations of claim 1.

Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claim 1, and all the claims that depend therefrom, are allowable. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 1-10.

Similarly, claim 12 as amended recites, *inter alia*, a flat panel display where the "transistor of at least one unit pixel among the R, G, B unit pixels includes a channel layer made of silicon layers having a different film quality." The Office Action asserts that this limitation is present in Zhang. While Zhang teaches two TFTs located in different regions that have different film qualities from each other, Zhang does not teach that either of these TFTs has a channel layer made of silicon layers having a different film quality. Therefore, Zhang does not teach nor suggest a single transistor having a channel layer "made of silicon layers having a different film quality." Thus, neither Yamada nor Zhang, alone or in combination, disclose or suggest all of the limitations of claim 12.

Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claim 12, and all the claims that depend therefrom, are allowable. Hence, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 12-18.

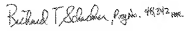
CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,


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